Dear FCC- I am a deaf individual and a relay user who would like to make comments
on FCC's proposed rule-making regarding VRS and internet relay.
1) IP Relay- Determining Which IP Relay Calls are Interstate and Which are
Interstate:

If there is a way to track where IP Relay calls are initiated and/or completed, then
I assume it makes sense to use the same formula used in traditional relay as closely
as possible. Try to keep procedures as similar as possible between traditional
relay and IP Relay.

If there is no way to track where the call initiated, perhaps a strictly
confidential registration could be used on a "temporary basis" until technology has
improved enough to be able to adopt a similar formula to traditional TRS. It will
be interesting to see what protocol is developed for VOIP, as I am certain that much
research will be done on ways to track calls as traditional phone companies do not
want to go out of business if everyone switches over to VOIP.

2) IP Relay- IP Relay as a Mandatory Form of TRS and Offered 24/7:

Functionally equivalent means that IP Relay should definitely be a mandatory form of
TRS AND should be offered 24/7. More and more, IP Relay is going to overtake
traditional relay services as more people are relying on their computers and ISP to
make relay calls. It is faster and much easier in terms of being able to
"interrupt" the relay operator when needed. If I were offered a choice on how to
make my relay call (using the tty or using the computer) I automatically go for the
computer, because it's just much more faster to make and complete a call. It's
still not as fast or equal to the length of time it would take a "hearing" person to
make the call by voice, however the length of making a relay call via IP Relay is a
bit shorter than traditional relay.

IP Relay should be offered 24/7 so that we do not discriminate from those people who
work night shifts and need to make calls, or just simply they want to call at
midnight to order pizza. If hearing callers can make calls 24/7, then so should
people who need to use the relay to make calls.   Right now, people fall back on
traditional relay during the hours IP Relay are not in operation, however my great
concern is that more and more people are giving up their TTY's, or even canceling
land phone lines, in favor of ISP services, pagers and computers, THUS the great
need to offer IP Relay 24/7.

3) IP Relay- Separate Rates for IP Relay and Traditional TRS:

4) Video Relay Service- Cost Recovery Methodology:

I agree that the cost compensation needs to be treated differently for VRS as
opposed to IP relay or traditional relay due to the costs involved in hire and
maintain qualified sign language interpreters. As for the discussion on rate of
return for capital investment, I wonder if a methodology could be adopted for those
VRS providers who uses some of the funds towards the training and development of
people who want to be employed as sign language interpreters. There is going ot be
a shortage of interpreters nationwide (already is which is going to be made worse by
the development of VRS centers, hiring interpreters who are greatly needed in
community interpreting.   It would made great sense if cost recovery methodology
takes this shortage of interpreters into account, and use of funds that goes toward
improving the number of qualified interpreters available. If not by using capital
investment, perhaps tax discount incentives?

5) Video Relay Service- Determining Which VRS Calls are Interstate and Which are
Interstate:

Same comment as 1) for VRS.

6) Video Relay Service- VRS as a Mandatory Form of TRS and Offered 24/7:

Same as IP Relay, functionally equivalent means that VRS should definitely be a
mandatory form of TRS AND should be offered 24/7.   VRS has been such an amazing,

miraculous service for so many Deaf people that we cannot discount it's importance. VRS is bringing many deaf people to be more closely functionally equivalent in society. For many, communicating in American Sign Language (ASL) is the most "comfortable or natural" language where they can acquire or impart information with another person.   Communicating via ASL really cuts down on the misunderstandings that happen by having to communicate in English via traditional relay and IP Relay. What's more, the call feels faster because it cuts out on the "typing" time and it feels more natural because there is more interaction as I am able to see the interpreter's facial expressions that reflects the tone or level of expression of the hearing party.   So I would like to be able to have the option of using VRS when I need !
 to or want to, anytime of the week and day.

Same as IP Relay, VRS should ideally be offered 24/7 so that we do not discriminate from those people who work night shifts and need to make calls, or just simply they want to call at midnight to order pizza. If hearing callers can make calls 24/7, then so should people who need to use the relay to make calls.

Obviously, VRS is going to have great implications on the labor pool of interpreters. My concern is two-fold. One is that there seems to be an exodus of interpreters from community interpreting to VRS interpreting. It seems that working for VRS is an attractive employment setting for those who do not like the excessive drive-time that is normally associated with community interpreting. There is a great need for community interpreters just as there is a great need for VRS interpreters, so an attractive balance needs to be sought out. I have heard from talking with interpreters that a VRS provider is requiring interpreters who want to join their workforce, to sign a contract stating that they will not interpret for other interpreting agencies including agencies that provide community interpreting. This hurts the community, and I would think that if we are going to push for the development of VRS, we also need to put forth some rules that protects community interpreting. !
  My second concern is the lack of qualified interpreters available to meet the great need of VRS interpreting and community interpreting. We already had a problem with interpreter labor shortage long before VRS came around, and now VRS is making this labor shortage even worse. I believe that it is only responsible for FCC to address this labor shortage by addressing creative ways that will help grow this pool. As I mentioned in number 4, perhaps find ways that encourage VRS providers to contribute to training and development of interpreters, and even using money that "advertises" interpreting as an attractive job opportunity.

7) Video Relay Service- Speed of Answer:

I really feel that the Speed of Answer should be equivalent to what is required for traditional relay, or better. Since we cannot be exactly functionally equivalent in terms of being able to call whoever we want to call directly, it takes more time to make the call to a relay service first, then after we hook up with the relay operator, we can then call where we intended to call.   Thus, the Speed of Answer should be as low as possible. If the ASA requirement for traditional relay is no more than 7 seconds, then I believe the goal of VRS should ideally be the same (ASA 7 seconds).   Right now, trying to hook up with a VRS CA is extremely time-consuming! Sometimes we have to wait 5 minutes (which is a good day) up to 20 minutes for an available CA.   I would guess that it would not be realistic for VRS to adopt ASA 7 seconds right away, however, I feel that this requirement should NOT be waived. Perhaps a tier approach could be adopted in the ASA requirement for VRS, by !
 easing into a set goal by say 2 minutes the first year of requirement, 1 and a half minutes the next year, 1 minute the following year and so forth.

8) Video Relay Service- Data Reporting Period:

Being able to collect reports about how VRS is going will be an important means of ensuring current and future quality services. I believe that we can draw on important and valuable lessons that were learned during the start-up of traditional relay. We have a responsibility to make sure that data reporting is done in a way that will help result in an efficient provision, and takes into account the rapidly

changing technology available.

9) Video Relay Service- Other VRS Issues:

The protocol or standards expected of CAs in VRS is an important area that needs much focus. CAs are humans, and not only are they are entitled to breaks, attention needs to focus on physical demands (interpreter's fingers, arms, shoulders, etc). Carpel Tunnel Syndrome is a big problem among interpreters from constant interpreting and not enough breaks so I know that it is going to be important to establish an "in-call" replacement procedure for interpreters who have been interpreting constantly for a set amount of time such as 20 minutes. Ideally it would be nice that the "change" does not take place until 15 or 20 minutes after a call is initiated, as this will keep all VRS calls fairly uniform so that VRS users will know what to expect.

There also needs to be a procedure for those interpreters who may feel that he or she is not able to continue in transacting the VRS call (cannot read the ASL signer or the level of topic out of interpreter's range of skills). Or it could be simply that the CA was not feeling well and just needed to go to the restrooms right away. To be fair to the VRS user, and keeping it uniform, perhaps procedures could include some kind of light signal alerting the VRS user to the fact that the interpreter is requesting an "in-call" replacement for another reason other than the standard 20 minute in-call change for breaks. This will help user realize that maybe the integrity of the previous conversation was compromised due to level of skill of interpreter and user could then wait for the "in-call" replacement without furthering the conversation. Or maybe to keep it simple, an alerting device could be created for all "in-call" replacements regardless of the reason, so that the user w!
 ill know the change is taking place and can automatically adjust conversation pace to meet that need.

As for permitting CAs to ask questions before making the call, I believe that is okay as long as there is a set norm for what kind of questions can be asked. For example, it would be okay for the CA to ask "what is the name of the party you are calling?" which is common. Maybe one or two more questions other than this could be allowed that helps CA understand whom the VRS user is trying to call, however I do believe rules need to be set to limit how many questions a CA can ask as we cannot allow for the possibility or chance that CAs "take control of the call". Allowing CAs to ask questions about what the "nature of the call" is about does not feel right. We need to try to keep the call as impartial and transparent as possible, making the VRS user feel that he or she is almost calling the other party directly without the CA there.

10) Certification and Oversight of IP Relay and VRS Providers:
We definitely need certification and oversight of IP Relay and VRS providers... how can we not! If we are going to be paying IP Relay and VRS providers with federal dollars (and possibly state dollars down the road) then we need to ensure that they are doing what they are supposed to be doing. We cannot determine how certification and oversight of IP Relay and VRS providers fit into proposals for determining interstate and intrastate calls, until we had addressed number 1, 3, 4 and 5 above. But, once we have addressed those issues, I would think certification and oversight will easily fall into place.

11) TRS Advisory Council:
I am not familiar with the roles covered by the TRS Advisory Council so I cannot provide much
comment here.

12) Abuse of Communication Assistants (CAs):
Obviously, we need to ensure that CA's are protected from abuse! I believe this issue alone will become a substantial part VRS rules as compared to traditional relay and IP Relay. And this is very important that these rules be adopted. I wanted to mention that some consideration should be covered to acknowledge that VRS callers need to be protected from possible abuse from CAs. The Deaf Community is a small place, and the work for CAs (sign language interpreters) is not as anonymous

as traditional relay and IP relay.

If CAs are dealing with abusive or threatening or sexually explicit language, there needs to be a distinction to whether the CA understand if it is being directed at them or at the other party. If CAs understand that the abuse is being directed to them directly, I would think that there needs to be some protocol that warns the abuser that it is not acceptable and that the CA will end the call if the abuse does not stop. There has to be a warning first and perhaps a standard language that CAs can use to warn, for example, "That (repeat what was the abusive comment or the inappropriate behavior) was not acceptable. If you repeat that comment or behavior, I have a right under rules section number XXX to report this to my supervisor and end the call." If the abuser persists, then the CA can state that the abuser had already been warned and that CA was ending call, but before doing so, CA should give the abuser a "report number" so that if abuser disagreed with what CA did, h!
 e or she can call the supervisor.   I think that similar protocols should be adopted for those calls the CA feels are "fraud" such as calls from Africa to order things on false credit card numbers.

As for the abuse that may be directed to the other party, I would think that standards need to be similar to the confidentiality that is required of traditional relay/ IP Relay CAs. This includes what is seen on the screen during idle time. However, I do believe that if this involves a discussion of planned harm towards another human being(s), then there needs to be protocol for CAs to break confidentiality.   I think this should be required of CAs (not just for VRS, but also for IP Relay and Traditional Relay). I have heard too often the stress that CAs endure when they had to transact a difficult call, and were not able to tell someone. It makes them lose value or faith in their work. So, there has to be some boundaries established and rules that would allow CAs to break confidentiality if they felt harm was imposed on others. I, myself work as a counselor, and in order to maintain our license/ certifications, we have a "duty to warn" if our clients tell us of harm t!
 hey plan to impart otn others. This "duty to warn" is a result of a lawsuit that was filed against a counselor and his employer (UC Berkeley) who did not act on information from client who revealed during a therapy session that he planned to kill his girlfriend due to concerns of breaking confidentiality. As a result, the girlfriend was killed so the girl's family filed the lawsuit against the counselor and UC Berkeley.

As for standards on what to do during idle time, I can imagine that many times the CA and caller will start their own side conversation that normally happens out in community interpreting. Should this be allowed, I don't know. I think we cannot be too strict and dictate what should happen during idle time but if there is going to be side conversation, it should be initiated by the caller (not the CA). If the caller initiates a side conversation during idle time, but the CA does not wish to participate, then CA should be allowed to excuse him/herself politely. It would be nice to have some "guidelines" on what to do during idle time if the caller does not initiate side conversation and/or the CA prefers not to participate in side conversation, then both the caller and CA can press the "screen privacy" button and when the call becomes activated, the CA can alert the caller using an alerting device.